

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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JANE DOE, LUKE LOE, RICHARD ROE, and MARY	:
MOE, individually and on behalf of all others similarly	:
situated,	:
	:
<i>Plaintiffs,</i>	:
	:
v.	:
	:
THE TRUMP CORPORATION, DONALD J. TRUMP, in	:
his personal capacity, DONALD TRUMP, JR., ERIC	:
TRUMP, and IVANKA TRUMP,	:
	:
<i>Defendants.</i>	:
	:
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No. 1:18-cv-09936 (LGS)

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and Affirmation of Cynthia Chen, together with its exhibits, Defendants The Trump Corporation, Donald J. Trump, in his personal capacity, Donald Trump, Jr., Eric Trump, and Ivanka Trump will move this Court, before the Honorable Lorna G. Schofield, United States District Judge for the Southern District of New York, on a date and time to be set by the Court, for an order (1) dismissing Counts One through Eight of the Amended Complaint pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, for failure to state a claim upon which relief can be granted; and (2) dismissing Counts Three through Eight of the Amended Complaint pursuant to Rule 12(b)(1) of the Federal Rules of Civil Procedure, for lack of subject-matter jurisdiction under 28 U.S.C. § 1332 and 28 U.S.C. § 1332(d)(2). The bases for the motion are set forth in the

accompanying Memorandum of Law and Affirmation of Ms. Chen.

Dated: February 21, 2019
New York, New York

Respectfully submitted,

SPEARS & IMES LLP

/s/ Joanna C. Hendon
Joanna C. Hendon
Cynthia Chen
Bradley Pollina

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Trump, and Ivanka Trump*